

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

JEREMY SCHENCK,
aka Emily,

Defendant.

Case No. *19-mj-96-slc*

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 2252(a)(2)

BEFORE United States Magistrate Judge
Peter Oppeneer

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

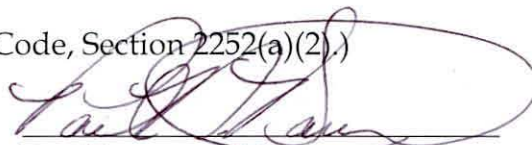
On or about November 6, 2018, in the Western District of Wisconsin and
elsewhere, the defendant,

JEREMY SCHENCK, aka Emily,

knowingly distributed a visual depiction using any means or facility of interstate and
foreign commerce, and the production of such visual depiction involved the use of a
minor engaging in sexually explicit conduct, and the depiction was of such conduct.

Specifically, SCHENCK used Kik messenger to send an image beginning with 3fdb8acf,
depicting a minor engaged in sexually explicit conduct, to a person in North Dakota.

(In violation of Title 18, United States Code, Section 2252(a)(2).)



Paul Bauman, Detective
Madison Police Department

Sworn to before me this 12th day of September 2019.



PETER OPPENEER
United States Magistrate Judge

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PETER OPPENEER
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WD WIS.

1. I am a Detective with the City of Madison Police Department (MPD). I have been a sworn law enforcement officer since May of 2005 and have been a Detective with MPD since January, 2011. I am currently assigned to the Special Victim's Unit (SVU). I have investigated numerous serious crimes, including sexual assaults, and have participated in physical surveillance, debriefing of sources, and executing search and arrest warrants.

2. The information contained in this affidavit is based primarily on information I learned during the course of my investigation into alleged criminal behavior of the defendant, Jeremy D. Schenck. Jeremy Schenck is a transgender male who identifies as female who has utilized the first names "Paige" and "Emily." I have also reviewed reports about the incident prepared by other law enforcement officers with the City of Madison Police Department and Williston Police Department, Williston, North Dakota. As the reports were prepared by other law enforcement officers during the course of their official duties, I believe them to be reliable.

3. On January 17, 2019, I spoke with CD,¹ the former live-in partner of the defendant, Jeremy Schenck. CD told your affiant that she had received an email on

¹ Initials are used throughout this affidavit to protect the identities of the victims and uncharged witnesses.

January 16, 2019, from an on-line acquaintance, KS, that KS had received nude images of two minor relatives of Schenck, from Schenck via an electronic messaging mobile app. KS resides in Williston, North Dakota.

4. On January 23, 2019, Williston, North Dakota Police Detective Alexius Enget interviewed KS who admitted to Det. Enget that she received images of the nude vagina of Jeremy Schenck's minor relatives. KS told Det. Enget that Jeremy Schenck sent the nude images via the chat feature on Snapchat, and that Schenck resides in Wisconsin.

5. On February 20, 2019, a search warrant was executed at Schenck's residence at 3164 Muir Field Rd., Apt. 306, Madison, Wisconsin. During the search of said residence, several electronic items were collected, including but not limited to an Apple iPhone 8 and Seagate 1TB computer hard drive. Department of Criminal Investigations (DCI) Digital Forensic Examiner Kimberly Bizub assisted with a forensic preview and later, a full forensic digital examination of the electronics seized during the search warrant. During the preview and full forensic examination of the above-referenced electronics, four images were found that meet the Wisconsin statutory definition of child pornography.

6. DCI Digital Forensic Examiner Bizub provided me with a DVD copy of the forensic examination results which included a chat history between the defendant, Jeremy Schenck and KS. The chat history is from KIK Messenger, a free instant messaging mobile app. The chat history includes the account user name for KS and account user name "emilyharper03" for Jeremy Schenck. The chat history was located

during the forensic examination of Schenck's Apple iPhone 8 Plus.

7. The Extraction Report/Chat History provided by DCI Digital Forensic Examiner Bizub includes the date and time of each message that was sent and/or received, along with any attachments (i.e. Images) to the message(s). The following chat/message exchange between KS and Schenck occurred on November 6 and 7, 2018:

Schenck: I've got a pussy pic for you (smirking emoji face)

KS: Oh

Schenck: (name of minor)² (smirking emoji face)

KS: M

Schenck: Image (File name: 3fdb8acf-64b4-4b90-b045-fe429ee32e67)

KS: smirking emoji face

Schenck: I came on her pussy

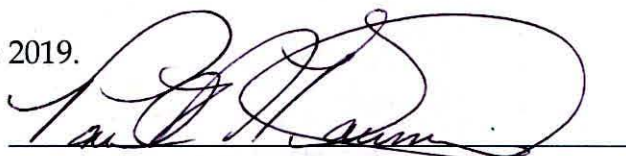
8. The image under file name "3fdb8acf-64b4-4b90-b045-fe429ee32e67" is a color image that shows an extreme close up view of a nude, toddler's vagina. The image displays the female toddler's legs spread open exposing the nude vagina and partial buttocks.

9. Title 18, United States Code, Section 2252(a) prohibits the possession, receipt, and distribution of visual depictions that involve the use of a minor engaging in sexually explicit conduct. Under Title 18, United States Code, Section 2256(2)(A)(v), "sexually explicit conduct" includes "lascivious exhibition of the genitals or pubic area

² Schenck used juvenile's first name in the chat message.

of any person."

Dated this 12th day of September 2019.

A handwritten signature in black ink, appearing to read "Paul N. Bauman", written over a horizontal line.

Paul N. Bauman, Detective

City of Madison Police Department

Sworn to before me this 12th day of September 2019.

A handwritten signature in black ink, appearing to read "Peter Oppeneer", written over a horizontal line.

~~STEPHEN L. CROCKER~~

United States Magistrate Judge

PETER OPPENEER